

1 Payam Khodadadi (SBN 239906)
McGuireWoods LLP
2 1800 Century Park East, 8th Floor
Los Angeles, CA 90067-1501
3 Telephone: 310.315.8208
Facsimile: 310.315.8210
4 Email: pkhodadadi@mcguirewoods.com

5 Joseph A. Florczak (admitted *pro hac vice*)
McGuireWoods LLP
6 77 W. Wacker Drive, Suite 4100
Chicago, IL 60601
7 Telephone: 312.849.8100
Facsimile: 312.849.3690
8 Email: jflorczak@mcguirewoods.com

9 *Counsel for Navient Solutions, LLC*
10 *and Navient Credit Finance Corporation*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **In re**

15 **OSCAR D. TERAN,**
16 **Debtor.**

Bankruptcy No. 10-31718 DM
Chapter 7

18 **OSCAR D. TERAN, on behalf of**
19 **himself and all those similarly situated,**
20 **Plaintiffs,**

Adversary Proceeding No. 20-03075

21 **v.**
22 **NAVIENT SOLUTIONS, LLC,**
23 **NAVIENT CREDIT FINANCE**
24 **CORPORATION,**
25 **Defendants.**

JOINT NOTICE OF DISMISSAL OF
INVOLUNTARY BANKRUPTCY CASE

1 Defendants Navient Solutions, LLC and Navient Credit Finance Corporation
2 (collectively, “Defendants”) and Plaintiff Oscar Teran (Plaintiff, and together with Defendants,
3 the “Parties”) hereby jointly provide notice to the Court as follows:

4 On February 8, 2021, an involuntary bankruptcy petition under Section 303 of the
5 Bankruptcy Code (the “Involuntary Petition”) was filed against Navient Solutions, LLC in the
6 U.S. Bankruptcy Court for the Southern District of New York (the “New York Bankruptcy Court”)
7 in Case No. 21-10249 (MG) (Bankr. S.D.N.Y.) (the “Involuntary Case”).

8 On February 18, 2021, the Court entered a docket text order stating that the automatic stay
9 applied to these cases and continued the hearings scheduled in the case to March 26, 2021.

10 On February 25, 2021, the New York Bankruptcy Court entered an order dismissing the
11 Involuntary Case against Navient Solutions, LLC.

12 Accordingly, the Parties hereby inform the Court that the automatic stay is no longer
13 effective against Navient Solutions, LLC and the hearings on March 26, 2021 can proceed as
14 scheduled.¹

15
16
17
18
19
20
21
22
23
24
25
26
27
28 ¹ On March 18, 2021, Ms. Heath provided consent to her signature on this Notice.

1 Dated: March 18, 2021

2 MCGUIREWOODS LLP

3 By: /s/ Payam Khodadadi

4 Payam Khodadadi (SBN 239906)

McGuireWoods LLP

5 1800 Century Park East, 8th Floor

Los Angeles, CA 90067-1501

6 Telephone: 310.315.8208

Facsimile: 310.315.8210

7 Email: pkhodadadi@mcguirewoods.com

8 Joseph A. Florczak (admitted *pro hac vice*)

McGuireWoods LLP

9 77 W. Wacker Drive, Suite 4100

Chicago, IL 60601

10 Telephone: 312.849.8100

Facsimile: 312.849.3690

11 Email: jflorczak@mcguirewoods.com

12 *Counsel for Navient Solutions, LLC*

13 *and Navient Credit Finance Corporation*

FRANCIS MAILMAN SOUMILAS, P.C.

By: /s/ Erika A. Heath

Erika A. Heath

369 Pine Street, Suite 410

San Francisco, CA 94104

Tel: 628-246-1352

Fax: 215-940-8000

eheath@consumerlawfirm.com

THE LAW OFFICE OF JAMES MICHEL

James Michel

attyjmicheel@gmail.com

2912 Diamond St #373

San Francisco, CA 94131-3208

Tel: (415) 239-4949

FRANCIS MAILMAN SOUMILAS, P.C.

James A. Francis

John Soumilas

David A. Searles

1600 Market Street, Suite 2510

Philadelphia, PA 19103

Tel: (215) 735-8600

Fax: (215) 940-8000

jfraiicis@consumerlawfirm.com

jsournilas@consumerlawfirm.com

dsearles@consumerlawfirm.com

*Attorneys for Plaintiff and the
Proposed Class*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 18, 2021, I electronically transmitted the foregoing document
3 entitled **JOINT NOTICE OF DISMISSAL OF INVOLUNTARY BANKRUPTCY CASE** to the
4 Clerk's Office using the CM/ECF System for filing and service via transmittal of a Notice of
5 Electronic Filing.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8 Executed on March 18, 2021, at Los Angeles, California.

9
10 By: /s/ Payam Khodadadi
11 Payam Khodadadi
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28